

# ABRAMS FENSTERMAN

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February 16, 2021

Via ECF

Hon. Sanket J. Bulsara, U.S.M.J.  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Chambers 304N, Courtroom 324N  
Brooklyn, New York 11201

Re: *Sessoms v County of Suffolk*, 20-cv-00509 (AAR)(SMG)

Dear Judge Bulsara:

I write on behalf of counsel to plaintiff, Amy B. Marion, Esq., in the above referenced action and with the consent of her adversary to request an extension of the February 15, 2021 deadline to submit letter motions regarding a protective order as per the deadline memorialized in Your Honor's January 12, 2021 Order.

On January 7, 2021, Ms. Marion filed her first request for an extension of the original January 8, 2021 deadline to submit letter motions regarding a protective order (the "First Request"). As memorialized in the First Request, which was filed with consent of her adversary, Ms. Marion needed the extension in order to immediately tend to a family emergency wherein Ms. Marion's mother was put into hospice eight (8) weeks ago. Since that time, Ms. Marion has relocated out of state in order to tend to her mother and has been doing so this entire time.

As a result, Your Honor's Order of January 12, 2021 granting the extension for submission of the letter motions was inadvertently missed. Ms. Marion profusely apologizes for the oversight and respectfully requests a second extension accommodating her in light of the fact that Ms. Marion's mother passed away last night on Monday, February 15, 2021.

Given the above-referenced circumstances, it is further requested that Ms. Marion have until Monday, March 15, 2021 to submit her letter motion with the County defendant's response due on March 24, 2021.

Respectfully,

*Katie L. Schwartz*

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Katie Schwartz, Esq. on behalf of Amy Marion